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*Lead Counsel for the
Indirect Purchaser Plaintiffs*

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:

**STIPULATION AND [PROPOSED]
ORDER APPROVING PAYMENT OF
EXPENSES FROM SETTLEMENT
FUND**

INDIRECT PURCHASER ACTION

1 WHEREAS, Indirect Purchaser Plaintiffs (“IPPs”) and Defendants LG Electronics, Inc., LG
2 Electronics USA, Inc., and LG Electronics Taiwan Taipei Co., Ltd, (collectively, “LG”) entered into
3 a settlement agreement on May 28, 2013 by which LG agreed to pay IPPs Twenty Five Million
4 Dollars (\$25,000,000) in return for a release of claims;

5 WHEREAS, the settlement agreement also provides that:

6 [A]fter final approval, Class Counsel may apply to use any amount paid by LG to
7 pay the past or future expenses of this litigation.

8 LG Settlement Agreement, ¶ 22(a);

9 WHEREAS, the Court granted preliminary approval of the LG settlement on December 9,
10 2013 (Dkt. No. 2248);

11 WHEREAS, in its Order Granting Preliminary Approval of Class Action Settlement With
12 LG, the Court directed IPPs’ Lead Counsel to provide notice to class members of the terms of the
13 settlement, including Lead Counsel’s request to withdraw up to \$5 million from the Settlement
14 Fund to pay expenses incurred or to be incurred in this litigation;

15 WHEREAS, said notice was given to Class Members as directed by the Court;

16 WHEREAS, the published notice provided that at the Final Approval Hearing: “The Court
17 will also consider Class Counsel’s request that \$5 million from the Settlement Fund be set aside to
18 pay for expenses incurred or to be incurred in prosecuting this case.”;

19 WHEREAS, after the Fairness Hearing, the Court entered its Order Granting Final Approval
20 of Settlement With LG (Dkt. No. 2542);

21 WHEREAS, the Order Granting Final Approval of Settlement With LG is now final;

22 WHEREAS, IPPs’ Lead Counsel seeks to withdraw \$500,000 from the Escrow Fund at this
23 time to pay for expenses incurred or to be incurred in this litigation;

24 WHEREAS, LG has no objection to IPPs’ Lead Counsel withdrawing \$500,000 from the
25 Escrow Fund to pay for expenses incurred or to be incurred in this litigation; and

26 WHEREAS, the Court has most recently approved the withdrawal of \$500,000 by the Direct
27 Purchaser Plaintiffs from their settlement with Philips to be used to pay expenses in their case (Dkt
28 No. 1507).

1 IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the
2 undersigned Plaintiffs and Defendants, as follows:

3 Lead Counsel for the Indirect Purchaser Plaintiffs may withdraw \$500,000 from the LG
4 Settlement Fund Escrow Account to pay expenses incurred or to be incurred in this litigation. The
5 balance of the settlement fund shall remain in the escrow account, to be distributed upon further
6 Court Order. Indirect Purchaser Plaintiffs' Lead Counsel shall provide the Court with an accounting
7 of all expenses paid.

8 The undersigned parties jointly and respectfully request that the Court enter this stipulation
9 as an order.

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11 Dated: June 12, 2014 By: /s/ Mario N. Alioto
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17 **Lead Counsel for the Indirect
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18 Dated: June 12, 2014 By: /s/ Hojoon Hwang
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24 **Attorneys for Defendants LG Electronics, Inc.; LG
Electronics USA, Inc.; and LG Electronics Taiwan
Taipei Co., Ltd**

1 IT IS SO ORDERED.
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Dated: June 12, 2014



Hon. Samuel A. Conti
UNITED STATES DISTRICT JUDGE